

# WI Draft Clean Unit Test



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Wisconsin Department of Natural Resources



# Clean Unit Test

- The Clean Unit Test is an alternative approach to major NSR applicability for modifications.
- If a change does not cause a Clean Unit to exceed its permitted allowable emissions, major NSR does not apply.
- If the permitted allowable emissions (or a design parameter upon which these are based) will be exceeded, then the source must determine whether the projected post-change emissions will result in a significant emissions increase and a significant net



# Clean Unit Test

## What Qualifies as a “Clean Unit”?

- Clean Unit Status is automatic for most emissions units that went through major NSR and are complying with BACT/LAER.
- Clean Unit Status can be granted through a permitting process for units that have not undergone major NSR if the emissions control is:
  - Comparable to BACT/LAER; or
  - Substantially as effective as BACT/LAER
  - Retroactive determination from January 1, 2001
  - Retroactive determination due 2 years from effective date of rule change

Emissions control can be add-on controls; pollution prevention; or work practices, but an investment in the control is required to qualify.



# Term of Clean Unit Status

- Clean Unit Status available for up to 10 years after applying emissions controls, or from designation if meeting today's control requirements
- To PAL term if designated as part of Clean Unit Opt Out provision while under PAL.



# Redesignation Options

- Reevaluate Designation as Clean Unit
- Require offset from Clean Unit employing BACT for significant increases
- As part of SIP, case-by-case evaluation of Clean Unit status



# Netting and Clean Units

- Projects under Clean Unit status not counted as creditable increase in netting analysis



# Emission Reduction Credits

- Reductions beyond Clean Unit rate available for ERC as follows:
  - Clean Unit renewed, ERC not surplus/void
  - Clean Unit not renewed, ERC maintained, but source no longer benefits from CU status